



U.S. Department of Justice

United States Attorney
Eastern District of New York

DGR/LRO/JML/VAZ
F. #2018R00788

271 Cadman Plaza East
Brooklyn, New York 11201

April 5, 2024

By E-mail and ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Moeleek Harrell, et al.
Criminal Docket No. 20-239 (S-8) (BMC)

Dear Judge Cogan:

For the purposes of the efficiency of the presentation of evidence, the government respectfully submits this letter to advise the Court and the defendants of exhibits it intends to offer through Special Agent Anthony Cunder, a publication witness in this case. These exhibits largely relate to the Rikers Island drug trafficking conspiracy charged in the indictment.

- **Photographs:** GX 16, GX 38, GX 52-C, GX 52-E, GX 105-F, GX 126, GX 138
- **Cellular Device Forensics:** GX 1140-G, GX 1172-B, GX 1172-C, GX 1172-D, GX 1174-B, GX 1174-C, GX 1174-C.1, GX 1174-C.2, GX 1174-C.3, GX 1174-D, GX 1174-E
- **Phone Records:** GX 1341, GX 1342, GX 1345, GX 1346, GX 1348
- **Financial Records:** GX 1609, GX 1611, GX 1615
- **Recorded Calls:** GX 2022, GX 2023, GX 2024, GX 2025, GX 2026, GX 2027, GX 2028, GX 2029, GX 2030, GX 2031, GX 2033, GX 2036, GX 2044
- **New York City Department of Correction Records:** GX 2209, GX 2211, GX 2212, GX 2213, GX 2214, GX 2215, GX 2225
- **Video:** GX 2530
- **Charts and Presentations:** GX 7005-A, GX 7005-B, GX 7005-C

The government is prepared to address specific bases for admissibility should the defendants raise any objections to particular exhibits. For the foregoing reasons, the Court should admit the above-identified exhibits as evidence at trial.

Respectfully submitted,

BREON PEACE
United States Attorney

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Enclosure (by E-mail)

cc: Counsel for New York Pod Defendants (by E-mail)
Clerk of Court (BMC) (by E-mail)